Pacific Telecom Services, LLC

January 24, 2012

City of Kirkland
Planning and Community Development
Attn: Planning Staff
123 Fifth Ave
Kirkland, WA 98033

RE: AT&T (Cingular) PWSF WA758 Totem Lake – Application for Planning Official Decision
Site location: 14216 132nd Ave NE and adjacent right-of-way

Dear City of Kirkland Planning Staff,

AT&T is proposing to modify its existing facility located at 14216 132nd Ave NE and adjacent right-of-way. The site is an antenna collocation on a wood utility pole owned by Puget Sound Energy, with ground equipment located in an enclosed shed on church property. Currently there are six antennas installed at the top of the pole, attached via flush mounts. AT&T's proposal is to replace the existing antennas with six (6) new antennas, which will be painted to match the pole. At the base of the pole, AT&T proposes to install remote radio head (RRH) units on a new utility frame. Inside the fenced lease area, AT&T is proposing to add a compact cabinet.

The purpose of the upgrade is to enhance the capacity of AT&T's network to serve its current and future customers through the incorporation of LTE technology at AT&T's existing network sites. LTE allows for better utilization of spectrum which benefits subscribers through higher data speeds, improved communication options and broadband features, in addition to traditional phone service. Because LTE uses additional frequencies, it is necessary to upgrade the equipment at sites that are not LTE-ready.

The proposed upgrade will expand the capacity of the AT&T network locally in Kirkland so that residents and visitors will benefit from increased reliable wireless service, improved coverage, and the ability to stay connected to work, family, and E-911 emergency services. According to a recent Nielson Mobile study[1], the percentage of wireless-only households increases every year, and wireless use is driven by a multitude of factors including mobility and economic savings. In addition, public safety is enhanced through improved, reliable networks as people are more able to access 911-related services from their homes or out in the community.

Responses to Application Questionnaire:

Explain how your proposal:

a. Minimize the total number of tall towers throughout the City:

Response: The proposal minimizes the number of tall towers by using an existing structure to support the antennas. The structure is a utility pole on a transmission line.

b. Minimizes visual and physical impacts on the surrounding area:

Response: The proposal calls for a modification to an existing site. The majority of the physical impact of constructing the site has already occurred, and been mitigated through careful design. The visual impact is minimized because the site utilizes existing infrastructure and is closely designed around that infrastructure so that it blends with the structure. Visual impacts are further reduced by painting the antennas and coax a similar color to the support structure, and maintaining the screening around the ground equipment. Physical impacts are

[1] Call My Cell: Wireless Substitution in the United States, September 2008.

reduced because modifying an existing site, and installing the replacement antennas on a utility pole already in use for collocation eliminates the need to build a second site. Locating the antennas on the existing structure also eliminates the need to replace another utility pole for the purpose of collocation, which further lessens the impact on City infrastructure and avoids additional trenching in the right of way. In addition, the upgrade is being accomplished by the replacement of antennas, not the addition of antennas, so the total number of antennas in the area is not increased, thereby minimizing impact.

c. Uses concealment technology as described in KZC 117.65.3 and KZC 117.70.8

Response: The antenna finish will be non-glare and non-reflective, and will also be the same color tone as the rest of the facility. All six antennas are proposed as replacements in the same place as the existing antennas, with little to no change in overall site appearance. Because the utility pole is industrial/utilitarian in appearance, the antenna supports, coax, and wireless equipment can blend into the tower by simply being painted.

d. Encourages shared use and collocation:

Response: The proposed scope of work is a modification to an existing facility that is collocated on a utility structure.

e. Avoids potential damage to adjacent properties:

Response: The antennas are located within a transmission easement that runs the length of the right-of-way, and the ground equipment is located in an enclosed space so as to eliminate visual impact on adjacent properties. The proposal is to replace antennas, rather than add antennas, so the site footprint remains the same. By modifying the existing site, rather than installing antennas on an adjacent structure, preserves the distance between the facility and nearby residences.

f. Is architecturally compatible with the surrounding buildings and land uses or otherwise integrated, through location and design, to blend in with the existing characteristics of the site:

Response: The ground equipment is not visible due to being located within an enclosed space built to blend into the side of the existing church building, and is therefore fully integrated into the existing site characteristics. The antennas are located on a utility pole on a transmission line, with other utility uses, the features of which are entirely industrial (wires, cables, transformers, insulators, etc.), and therefore compatible in function and appearance.

Thank you for your consideration of this application.

Sincerely,

Becky Todd

Becky Todd
Land Use/Site Acquisition
PTS
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AT&T Minor Site Modification – WA758 Totem Lake
Statement of Compliance with KZC 117

Application Review Process

The process identified pursuant to the 1/1/12 KZC modification for wireless sites within the area annexed from King County in 2011 was a Planning Official Decision. The proposal is to upgrade an existing antenna array by replacing all six (6) antennas in their current location and configuration. The antennas are collocated on an existing PSE utility pole, with no change to the dimensions of the utility tower (support structure). The applicable code criteria found under KZC 117.40 are as follows:

Review Process	Facility Type1
1. Planning Official Decision (Planning Official issues decision.)	c) Attachment of antennas to existing water reservoirs, utility poles, or other support structures in any zone.2 See KZC 117.65(6) and (7).

2 Attachment of antennas to existing water reservoirs or other support structures, or to existing or replacement utility poles, where such attachment results in a height increase to the original support structure, may be approved only once through the review process indicated. Any subsequent proposal that would result in a height increase shall be reviewed through Process IIB.
117.65 PWSF Standards

Site Appearance

The proposed minor modification will satisfy the design criteria set forth by the City of Kirkland regarding aesthetics under KZC 117.65 PWSF Standards. The City requirement is that the site reflects the context within which it is located is architecturally integrated and blends with existing site characteristics, and employs some form of concealment technology or employs alternate measures that are appropriate for the contextual setting of the wireless facility.

The site is an existing, approved facility that is being upgraded through the replacement of antennas at the same level as the existing antennas at the top of a PSE utility pole. The additional coax will be routed within the existing conduit. The antenna finish will be non-glare and non-reflective, and will also be a similar color tone as the rest of the facility. Because the utility pole is industrial/utilitarian in appearance, the antenna supports, coax, and wireless equipment best blends into the tower by simply being painted.

Support Structure Setbacks and Height

Setback requirements from property lines do not apply to the existing PSE utility pole located in the transmission easement in the right of way. This site was originally permitted and approved under the King County regulations in existence at the time of the facility installation. Under recent code amendments, such a structure is now considered an approved use (KZC 117.15.3), and as such, reconfigurations or additions to antennas or the structure are permitted (KZC 117.20.2).

The antennas were installed on the utility pole in a manner that complied with the King County requirements that antennas could be installed on utility poles, with a maximum total pole extension of 40 feet, with no limitation on where the antennas could be placed within that 40 feet (KCC 21A.26.400). A copy of the original approved permit, reviewed through King County Real Estate Services and DDES, is attached.

Signal Interference, FAA and FCC Compliance

The City code standards for signal interference (KZC 117.65.9) and compliance with FAA/FCC requirements (KZC 117.65.14) are addressed in a notarized letter included with this application. The Code requires that PWSF antennas do not cause localized interference with other users, and that the most current FAA/FCC standards are met.

AT&T will be operating its facility using the frequencies licensed by the FCC, in compliance with FCC regulations and AT&T's obligations as a licensee. Also included is a Non-Ionizing Electromagnetic Exposure Analysis & Engineering Certification (NIER Report) showing compliance with FCC standards for human exposure to radiofrequency, a TOWAIR report showing the facility height is within acceptable limits.

Lighting, Signals and Signs

No signals, lights or signs, other than what is required by the FCC/FAA, will be installed at this facility. Currently, there is no FAA lighting requirement, and no lights are proposed.

Noise

The installation and operation of PWSF shall comply with the noise standards set forth in KZC 115.95. A Noise report prepared by SSA Acoustics, LLP, is included with the application to demonstrate compliance with the standard.

Equipment Structure Standards

All of AT&T's ground equipment is located within an existing, approved lease area, which is integrated into the side of the church using the same materials as the church exterior. While the code currently requires five-foot equipment structures and 125 square foot equipment enclosures, the lease area as it presently exists has been approved under the previous permit, and any equipment modifications will take place within the structure and hidden from public view. The enclosure and existing landscaping will remain in their present location. The equipment that will be visible to the public will be attached to the utility pole, and per KZC 117.70.6, such equipment is subject to review by Public Works and the utility provider to ensure the safety of users of the right-of-way. Here the RRH units attached to the pole meet PSE's design requirement of being installed below the 10-foot mark on the utility pole.

The existing equipment shed is both compatible with the surrounding area and concealed, as required under KZC 117.70.7-8. The exterior siding uses the same materials as the exterior of the church and is completely enclosed.

Per117.75 Screening, landscape requirements do not apply to sites located in the right-of-way. No alterations to the adjacent landscaped areas are planned.

SEPA

A checklist is included in this application.